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October 22, 1997

EX PARTE PRESENTATION

RECEIVED

OCT 28 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND DELIVERY

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

Re: Routine Licensing of Large Numbers of Small Antenna Earth Stations
IN Report No. 97-27; RM 9005

Dear Mr. Caton:

Yesterday, an ex parte meeting was held in the office of Commissioner Ness to discuss pending proposals (a) to permit spectrum sharing of the 17.7-20.2 GHz ("18 GHz") band by Fixed Service and Fixed Satellite Service users and (b) for the blanket licensing of FSS earth stations operating in the 18 GHz band.

Attending this meeting were representatives of the following organizations:

- Fixed Point-to-Point Communications Section, Network Equipment Division of the Telecommunications Industry Association
- Harris Corporation, Farinon Division
- Digital Microwave Corporation
- Alcatel Network Systems
- National Association of Broadcasters
- American Petroleum Institute
- Wireless Cable Association
- Association of American Railroads
- UTC-The Telecommunications Association

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William F. Caton
October 22, 1997
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An original and copy of this letter, together with a copy of the handout distributed at this meeting, are submitted herewith. Should any questions arise concerning this filing, please contact the undersigned counsel.

Sincerely,

A handwritten signature in cursive script, appearing to read "Eric Fishman".

Eric Fishman

Attachment

FSS proposals for FS/FSS sharing at 18GHz

18GHz FS Coalition meeting,
Washington, Oct. 21, 1997

18 GHz FS Coalition

- TIA (Pt.-to-Pt. Section)
- NSMA
- NAB
- WCA
- GTE Wireless
- APCO
- UTC
- API
- AAR

18 GHz FS and Emerging Technologies

- 40,000 licensed systems provide critical Public Safety and Public Utility services, wireless network and Bank interconnections, Broadcast Auxiliary services
- 18 GHz is replacement spectrum for relocated or congested 2, 6, 11 GHz bands
- Strong future requirement to support emerging technologies such as urban cell interconnections and HDTV

History of 18GHz FSS proposals

- Dec. 1996 5 FSS companies ask for Blanket Licensing (B. Lic.) of millions of E.S. in 19.7-20.2 GHz
- Feb. 1997 Teledesic asks for B. Lic. through the entire 17.7-20.2GHz band
- March 1997 Original petitioners do not oppose Teledesic but note FSS presence in 17.7-19.3GHz raises difficulties better addressed in separate Working Groups

History (cont'd)

- March 1997 Teledesic condemns the concept of FS/FSS sharing for newest FS and FSS systems (IB Docket 97-95)
- Sept. 1997 FCC asks comments to refresh record on FS/FSS sharing at 18GHz
- Sept. 24, 1997 23 known commenters; 14 (FS) oppose B. Lic. at 18GHz, question sharing; 6 (FSS) do not want 18GHz B. Lic. in NPRM; Teledesic/Hughes remain isolated

18/28GHz FSS applicants

- Teledesic (Std links)
- Teledesic (Gigalinks)
- Motorola (Celestri)
- Motorola (Millennium)
- Hughes (Galaxy)
- GE Americom
- Loral Space&Com.
- Lockheed Martin
- PanAmSat
- Vision Star
- Orion Atlantic
- Orion Network System
- NetSat 28
- Morning Star
- KaStar
- EchoStar

38/50GHz FSS applicants

- **Teledesic**
- **Motorola (M-Star)**
- **Hughes (Star Lynx)**
- **Hughes (Space Cast)**
- **Hughes (Expressway)**
- **GE Americom**
- **Loral**
- **Lockheed Martin**
- **PanAmSat**
- **TRW**
- **Orbital Science**
- **CAI Satellite**
- **Denali Telecom**
- **Leo One USA**
- **Spectrum Astro**

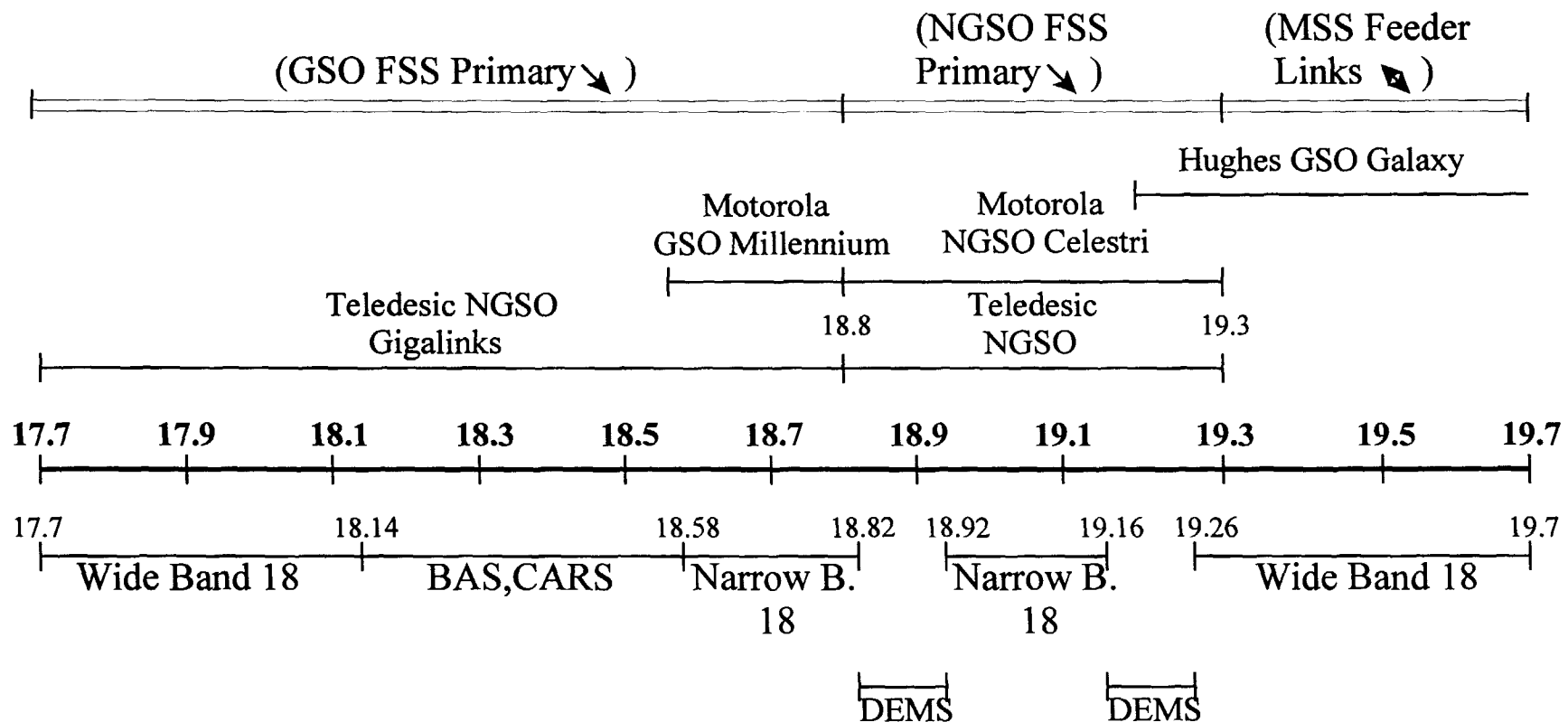
Why such a flood of FSS applications?

- Successive FCC filing windows make FSS companies file to protect their future capability to make decisions
- 38GHz FSS filings are probably a response to strong FS growth in that band
- Companies like Teledesic, Motorola or Hughes appear to file separate applications for different parts of the same system!

Proposed FSS in 17.7-19.7GHz

- Teledesic NGSO standard user links (18.8-19.3GHz) and NGSO Gigalinks (17.7-18.8GHz)
- Motorola/Comm, Inc. NGSO Celestri (18.8-19.3GHz) and GSO Millennium (18.55-18.8GHz)
- Hughes GSO Galaxy (19.2-20.2GHz)

Current FSS proposals in 17.7-19.7GHz



Next Steps

- WRC-97 might impact Teledesic at 18GHz and FSS at 38GHz
- Coming FCC NPRM on FS/FSS sharing at 18GHz
- TIA TR14/TR34 seems best forum for technical discussions on FS/FSS sharing potential at 18GHz (but 2.1GHz discussions still consume resources)

18 GHz Coalition Position

- Talking about B. Lic. is useless until TR14/TR34 has proven sharing is a possibility
- FCC/ITU-R record shows FS cannot share with service links of newest FSS systems; F.L. and Gateways may be better candidates
- Disorganized flood of FSS applications must not impair important FS uses at 18GHz; FCC should challenge FSS and force consolidation of applications

18 GHz Coalition Proposals

- Expanding FS/FSS needs must be accommodated
- Key technical issues must be resolved before FCC acts on any 18GHz FSS applications
- Joint industry group must be required by FCC to resolve technical issues as a prerequisite to any action on FSS between 17.7-19.7 GHz